

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RILEY GAINES, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:24-cv-01109-TRJ
)	
NATIONAL COLLEGIATE)	
ATHLETIC ASSOCIATION, <i>et al.</i>)	
)	
Defendants.)	

DECLARATION OF [REDACTED] (TRACK ATHLETE A)
(FILED Under Seal)

I, [REDACTED], declare as follows:

1. I am a resident of the United States, an adult over the age of eighteen, and am competent to testify and have personal knowledge of the facts stated in this declaration.
2. I attended the Rochester Institute of Technology (RIT) in Rochester, New York.
3. RIT is a Division III member institution of the National Collegiate Athletic Association (NCAA).
4. I was a member of the RIT women's track and field team during the 2021 to 2022, 2022 to 2023, 2023, to 2024, and 2024 to 2025 seasons.

5. Women's track and field has an indoor season, which typically occurs in late winter and early spring, and an outdoor season, which typically occurs during the mid- and late-spring.

6. While rostered on the RIT women's track and field team, I competed in the women's 60-meter, 200-meter, 300-meter, and 400-meter sprint events (indoor) and 100-meter, 200-meter, and 400-meter sprint and 400-meter hurdles events (outdoor), as well as the 4x100-meter relay (outdoor) and 4x400-meter relay (indoor and outdoor).

7. During the 2022 to 2023 season, I was the only sprinter on the women's track and field team at RIT who specialized in the 200-meter and 300-meter indoor sprints, and I achieved the school records for the fastest times in the women's 200-meter and 300-meter indoor events.

8. Sadie Schreiner attended RIT and is a trans-identifying male athlete who joined the RIT women's track and field team for the 2023 to 2024, and 2024 to 2025 season. In high school, Schreiner was known as Camden Schreiner and competed as a male athlete for Northern Highlands High School in Allendale, New Jersey.

9. On information and belief and to the best of my knowledge, Schreiner did not undergo any transition therapy or treatment before going through puberty.

10. Shortly after joining RIT's women's team, Schreiner began to get in my face to taunt me in a confrontational manner about "coming after" my school records.

11. In 2024, Schreiner beat my women's 300-meter indoor time by 1.42 seconds.

12. In 2025, Schreiner beat my women's 200-meter indoor time by 1.36 seconds.

13. RIT treated Schreiner's times in the 200-meter and 300-meter indoor events as a woman's times and gave Schreiner the RIT school records for these events.

14. As of the date of this declaration, RIT has not removed Schreiner's times in the 200-meter and 300-meter indoor events from its women's record books or reinstated my records in those events.

15. Schreiner also holds RIT records for the fastest times in the indoor 400-meter, outdoor 200-meter, outdoor 400-meter, and was a part of the fastest and second fastest 4x400-meter indoor relay and second-fastest 4x100-meter relay.

16. A true and accurate copy of the RIT women's indoor track and field records is attached to this declaration as Exhibit A, which is publicly available at the following url: <https://ritathletics.com/sports/2022/1/7/wtrack-indoor-records>.

17. A true and accurate copy of the RIT women's outdoor track and field records is attached to this declaration as Exhibit B, which is publicly available at the following url: <https://ritathletics.com/sports/2022/3/23/womens-track-field-outdoor-records>.

18. Schreiner's participation on the RIT women's track and field impacted more than just the times and places of other RIT female athletes and competitors. Schreiner's participation took away coaching time that I and other women would have received had Schreiner not participated on the team.

19. Prior to Schreiner joining the RIT women's track and field team, I received one-on-one coaching time. After Schreiner joined the RIT team, I received significantly less one-on-one coaching time.

20. Schreiner's participation also had the effect of discouraging me from competing in events that Schreiner ran because it is inherently unfair to have to compete against and lose to a man in a women's competition.

21. In 2025, I decided to run the 400-meter outdoor hurdles, in part, because this was an event in which Schreiner did not compete and I would not have to worry about Schreiner beating my times.

22. I am aware that in February 2025, the NCAA changed its transgender participation policy and that this policy made Schreiner ineligible to compete in

NCAA events but did not prohibit Schreiner from participating on the RIT women's track and field team.

23. I was not made aware of the NCAA's new transgender participation policy by my RIT coaches or any RIT staff. Instead, I heard about it from other third parties.

24. After the NCAA changed its policy in February 2025, the only thing that changed for Schreiner was that Schreiner no longer competed on behalf of RIT.

25. No RIT coach informed me that Schreiner was no longer on the RIT women's track and field team.

26. After the NCAA changed its policy in February 2025, Schreiner continued to participate in practices and continued to receive coaching from RIT coaches, which continued to take away coaching time from me and the RIT female athletes.

27. After the NCAA changed its policy in February 2025, Schreiner continued to have access to and used the RIT women's locker room and I continued to feel uncomfortable with Schreiner's presence in the locker room and that my privacy was continuously violated.

28. After the NCAA changed its policy in February 2025, Schreiner continued to compete in open competitions unattached to any school.

29. I do not hold any personal animus towards transgendered persons, but I do hold the belief that trans-identifying male athletes should not participate in women's sports on the grounds of inherent unfairness.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July ^{25/07/2025}2025.






EXHIBIT A

Rochester Institute of Technology Athletics

Women's Track & Field - Indoor Records

Women's Track & Field - Indoor Records

(As of Feb. 28, 2025)

50 Meters
7.0 - Amy Weber (1993)

55 Meters
7.39 - Samantha Mitchell (2010)

60 Meters
7.89 - Rachel Kulp (2025)
[REDACTED]
8.05 - Melissa St. Preux (2012)

200 Meters
24.46 - Sadie Schreiner (2025)
[REDACTED]
26.03 - LaKeisha Perez (2007)

300 Meters
40.66 - Sadie Schreiner (2024)
[REDACTED]
42.27 - Marissa Dispenza (2020)
42.3h - Harley Wilson (2017)

400 Meters
55.91 - Sadie Schreiner (2025)
56.89 - Harley Wilson (2019)
58.17 - Danielle Simmons (2005)

500 Meters
1:16.01 - Danielle Simmons (2005)

600 Meters
1:39.42 - Harley Wilson (2019)

800 Meters
2:10.38 - Amanda White (2015)

1,000 Meters
2:57.82 - Rebecca Schwan (2016)

1,500 Meters
4:41.66 - Heidi Spalholz (2003)

Mile
4:59.95 - Emma Jones (2017)

3,000 Meters
10:03.45 - Emma Jones (2016)

5,000 Meters
17:55.97 - Stephanie Milici (2016)

50 Meter Hurdles
7.88 - Kristen Rice (1998)

55 Meter Hurdles
8.36 - LaKeisha Perez (2008)

60 Meter Hurdles

9.09 - LaKeisha Perez (2008)

High Jump

1.61m /5' 3.25" - Jessica Calzolari (2017)

Pole Vault

3.62m/11' 10.5" - Catherine Fox (2024)

3.54m/11' 7.25" - Samantha Kaplan (2018)

3.51m/11' 6" - Jessica DeAngelo (2016)

Long Jump

5.79m/19' 0" - Jennifer Adams (2012)

Triple Jump

11.42m/37' 6" - Jessica Calzolari (2017)

11.36m/37' 3.25" - Rania Sabri (2025)

Shot Put

13.53m/44' 4.75" - Allison Griggs (2003)

Weight Throw

16.36m/53' 8.50" - Allison Griggs (2006)

Penthalon

3,273 - Hailey Burkhart (2016)

4x200m Relay

1:46.42 - Kelly Fredette, Uchechi Nna, Samantha Orlando, Hailey Burkhart (2015)

4x400m Relay

4:00.99 - Emily Bernabeo, Colleen Eckl, Ali Binga, Harley Wilson (2019)

4x800m Relay

9:33.58 - Kaylin Beiter, Amanda White, Kristine Reed, Emma Jones (2015)

Sprint Medley

4:26.94 - Lindsay Kolcheski, LaKeisha Perez, Kat Springate, Trisha Sliker (2005)

Distance Medley

12:00.54 - Rebecca Schwan, Liz Pieri, Kristine Reed, Emma Jones (2016)

EXHIBIT B

Rochester Institute of Technology Athletics

Women's Track & Field - Outdoor Records

Women's Track & Field - Outdoor Records

(As of May 15, 2025)

100 Meters

12.12 - Michele Jones (1985)

200 Meters

24.11 - Sadie Schreiner (2024)

25.1 - Michele Jones (1984)

400 Meters

55.07 - Sadie Schreiner (2024)

58.08 - Danielle Simmons (2005)

800 Meters

2:11.35 - Amanda White (2015)

1,500 Meters

4:37.27 - Rebecca Schwan (2018)

3,000 Meters

10:25.45 - Amelia Gilbert (2024)

10:29.95 - Sierra Danieu (2024)

10:40.0 - Trisha Sliker (2007)

5,000 Meters

17:41.66 - Jennifer Crossen (2018)

10,000 Meters

37:10.73 - Stephanie Milici (2015)

100 Meter Hurdles

14.38 - LaKeisha Perez (2007)

400 Meter Hurdles

60.78 - Harley Wilson (2019)

62.99 - Marissa Dispenza (2022)

3,000 Meter Steeplechase

11:00.74 - Erin LaFave (2012)

High Jump

1.62m/5' 3.75" - Jessica Calzolari (2016)

Pole Vault

3.61m/11' 10" - Catherine Fox (2024)

3.53m/11' 7" - Samantha Kaplan (2019)

3.42m/11' 2.5" - Jessica DeAngelo (2015)

Long Jump

6.08m/19' 11.5" - Molly Urquhart (2003)

Triple Jump

11.44m/37' 6.5" - Colleen Eckl (2021)

10.92m/35' 10" - Tabatha Gano (1992)

Shot Put

13.63m/44' 8.75" - Allison Griggs (2004)

Discus

46.35m/152' 0" - Emily DiMarco (2024)

41.06m/134' 8" - Kendra Bush (2016)

Hammer

53.84m/176' 8" - Allison Griggs (2004)

Javelin

38.18m/125' 3" - Hailey Burkhart (2013)

Heptathlon

4,332 points - Hailey Burkhart (2015)

4x100 Relay

48.30 - Allison Regnante [REDACTED] Rania Sabri, Rachel Kulp (2025)

48.72 - Allison Regnante, Sadie Schreiner , Rania Sabri [REDACTED]

48.85 - Emily Young, Uchechi Nna, Hailey Burkhart, Kelly Fredette (2015)

4x400 Relay

3:55.78 - [REDACTED] Violet Ameele, Samantha Crisci, Sadie Schreiner (2024)

3:57.90 - Sadie Schreiner , Sydney Burgard, Samantha Crisc [REDACTED]

3:58.97 - Sydney Burgard, Marissa Dispenza, Colleen Eckl, Harley Wilson (2021)

4x800 Relay

9:15.32 - Nicole Varble, Trisha Sliker, Adrienne Gagnier, Danielle Simmons (2007)

Distance Medley Relay

12:56.9 - Adrienne Gagnier, Nicole Varble, Trisha Sliker, Amy Hopkins (2007)